

MAIN FILE



DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

Permit 40003

July 15, 2014

Mr. Sanford Phillips
Assistant Secretary, Environmental Services
Department of Environmental Quality
P. O. Box 4313
Baton Rouge, LA 70821-4313
CERTIFIED MAIL NO. 7011 3500 0001 6350 0967

Dear Mr. Phillips:

Re: Title V Permit - Minor Modification Request
✓ AI No. 38806 - Permit No. 3000-V4

original to IOA
copy to Petro / Lisa Taylor
DWM

Enclosed are three copies of a Title V Minor Modification Permit Application for DuPont's Chloroprene Unit located in LaPlace, Louisiana. This application includes the incorporation of a Case-by-Case approved on May 20, 2014 and a request to incorporate the fugitive emissions consolidation program in to this permit. The consolidation program was approved by your office on December 20, 2013.

Enclosed is a check for \$1,866.00 to cover the cost of this application. If you need additional information or have any questions you can contact me at 985-536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego, P.E.
Senior Environmental Consultant

Enclosures

2014 JUL 18 PM 1:28
DWM - QES

Monday, July 21, 2014

8:29:19 AM

RECEIPT OF CHECK

Master AI #: 38806
Name on Check: El DuPont De Nemours & Company
Master File Name: E I DuPont de Nemours & Co - Pontchartrain Site
Check Received Date: 7/18/2014
Check Date: 7/7/2014
Check Number: 3000148460
Check Amount (\$): \$1,866.00
Staff Entry: SUNSHINEM
Date data entered: 7/21/2014
Media: AIR
Reason: Modification

Comments:



**E.I. DUPONT DE NEMOURS
PONTCHARTRAIN SITE
CHLOROPRENE UNIT**

**APPLICATION FOR A MINOR MODIFICATION
PERMIT NUMBER 3000-V4**

**LAPLACE, LOUISIANA
ST. JOHN THE BAPTIST PARISH**

AGENCY INTEREST NUMBER 38806

JULY 15, 2014

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- Appendix A Air Emission Calculations
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SECTION 1.0

INTRODUCTION

1.0 INTRODUCTION

E.I. DuPont de Nemours & Co., Inc. (DuPont) owns and operates a chemical manufacturing facility near LaPlace, Louisiana referred to as the Pontchartrain Site. The Site Location Map is provided in Figure 1.

Pontchartrain Site is a major source with respect to LAC 33:III.507 and 40 CFR 70 (i.e., a major source under the Part 70 Operating Permit program), a major stationary source with respect to LAC 33:III.509 and 40 CFR 51.166 (i.e., a major source under the Prevention of significant Deterioration [PSD] subprogram of the New Source Review [NSR] program) and a major source of toxic/hazardous air pollutants with respect to LAC 33:III.Chapter 51 and 40 CFR 63.

The site operates under several Part 70 operating permits for the following units: Neoprene Unit, Chloroprene Unit, HCl Recovery Unit, Diamines Unit and the Power Unit. The Chloroprene Unit is permitted under permit number 3000-V4 which expires on April 26, 2017. This minor modification request is being submitted to incorporate a Case-by-Case request that was approved on May 20, 2014. In addition, DuPont is requesting to update the fugitive emissions requirements under this permit, to incorporate the fugitive emissions consolidation program that was approved in November 2013 for all the manufacturing units at this site.

1.1 Process Description

The DuPont Chloroprene Unit is a Synthetic Organic Chemical Manufacturing Industry (SOCMI) facility. Chloroprene (2-chloro-1,3-butadiene) is produced primarily as a raw material for the Neoprene Manufacturing Process. Chloroprene is manufactured by four steps:

1. DCB Synthesis – In the first step, Dichlorobutene (DCB) is manufactured in a liquid phase by ionic chlorination of butadiene in an evaporative cooled isothermal reactor. Crude DCB is a mixture of two isomers: 1,4 and 3,4 DCB.
2. DCB Refining – In the second step, the Crude DCB product is refined in a series of distillation columns. In the refining process, two DCB isomers (1,4-DCB and 3,4-DCB) are separated.
3. CD Isomerization - In this step, the 1,4-DCB is isomerized to 3,4-DCB which is the desired raw material for the next and final monomer step.
4. CD Synthesis – In the last step, the refined 3,4-DCB is reacted with caustic, water, and a catalyst. The mixture is fed to a reactor to produce chloroprene.

Following a series of strippers and decanters, refined chloroprene is stored for use as the raw material in the manufacture of Neoprene.

1.2 Proposed Changes

Under General Condition XVII, the Chloroprene Unit is allowed to remove solids from storage tanks for a period of 50 days per year, with an emission limit of 0.025 tons per year of organics. In May 2014 it was necessary to request a Case-by-Case approval to increase the amount of emissions from the tanks cleaning activity. This unit is experiencing an increase of solids deposits that contain higher amounts of organics.

This request is to increase the number of permitted days allowed to perform solid removals from tanks to 80 days per year and to increase the emissions from this activity to 4.0 tons per year of organics. This activity will meet three of the requirements listed under LAC 33:III.537, Table 1 for Condition XVII activities.

- ✓ Less than 5 TPY of criteria and toxic air pollutants;
- ✓ Less than the minimum emission rate (MER);
- ✓ Regularly scheduled (e.g., daily, weekly, monthly, etc.);

1.3 Consolidation of Fugitive Emissions Programs

On December 20, 2013, LDEQ issued a letter of no objection to a request for a site wide consolidation of the fugitive emissions program. A copy of the letter is included in Appendix B. DuPont is requesting to incorporate the consolidation program requirements into the Chloroprene Unit permit.

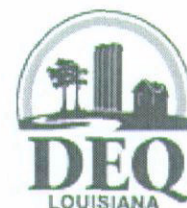
SECTION 2.0
APPLICATION FOR APPROVAL OF
EMISSIONS

Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

LOUISIANA

Application for Approval of Emissions of Air Pollutants from Part 70 Sources

Paperwork Reduction Format



PLEASE TYPE OR PRINT

1. Facility Information [LAC 33:III.517.D.1]

Facility Name or Process Unit Name (if any) Chloroprene Unit		<input type="checkbox"/> All Process Units <input checked="" type="checkbox"/> Process Unit-specific Permit
Agency Interest Number (A.I. Number) 38806	Currently Effective Permit Number(s) 3000-V4	
Company - Name of Owner E.I. DuPont de Nemours and Co., Inc. (DuPont)		
Company - Name of Operator (if different from Owner)		
Parent Company (if Company – Name of Owner given above is a division)		

Ownership:

Check the appropriate box.

- ☒ corporation, partnership, or sole proprietorship ☐ regulated utility ☐ municipal government
☐ state government ☐ federal government ☐ other, specify _____

2. Physical Location and Process Description [LAC 33:III.517.D.18, unless otherwise stated]

What modifications/changes are proposed in this application? Add more rows as necessary.

Incorporate a Case-by-Case insignificant activities and consolidation of the fugitive emissions programs.

What does this facility produce? Add more rows as necessary.

This unit manufactures chloroprene, which is used as raw material in the manufacture of neoprene.

Nearest town (in the same parish as the facility):

LaPlace

Parish(es) where facility is located:

St. John the Baptist

Distance To (mi):	<u>194</u> Texas	<u>210</u> Arkansas	<u>56</u> Mississippi	<u>131</u> Alabama
Latitude of Facility Front Gate:	<u>30</u> Deg	<u>03</u> Min	<u>14</u> Sec	_____ Hundredths
Longitude of Facility Front Gate:	<u>90</u> Deg	<u>31</u> Min	<u>29</u> Sec	_____ Hundredths
Distance from nearest Class I Area:	<u>113</u>	kilometers		

Add physical address and description of location of the facility below. If the facility has no address, provide driving directions. Add more rows as necessary.

The facility is located at 586 Highway 44, LaPlace, Louisiana. The facility is bordered on the south by the Mississippi River, to the north by John L. Ory School and Airline Highway. Residential properties adjoin the facility to the east and the west.

- ☒ Map attached (required per LAC 33:III.517.D.1)
☒ Description of processes and products attached (required per LAC 33:III.517.D.2)
☒ Introduction/Description of the proposed project attached (required per LAC 33:III.517.D.5)

4. Type of Application [LAC 33:III.517.D]

Complete the appropriate column (1 or 2) that corresponds to the type of permit being sought. Check all that apply within the appropriate column.

Column 1	Column 2
<input type="checkbox"/> Part 70 General	<input checked="" type="checkbox"/> Part 70 Regular
<input type="checkbox"/> Renewal	<input type="checkbox"/> Renewal
Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Modification or expansion of existing facility (may also include reconciliations) <input type="checkbox"/> Reconciliation only <input type="checkbox"/> Individual emissions unit(s) addition	Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Significant modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.527] <input checked="" type="checkbox"/> Minor modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.525] <input type="checkbox"/> Reconciliation only NSR Analysis: PSD <input type="checkbox"/> NNSR <input type="checkbox"/>

Does this submittal update or replace an application currently under review? ☐ Yes ☒ No

If yes, provide date that the prior application was submitted: _____

Select one if this application is for an existing facility that does not have an air quality permit:

- ☐ Previously Grandfathered (LAC 33:III.501.B.6)
☐ Previously Exempted (e.g., Small Source Exemption; Act 918)
☐ Previously Unpermitted

5. Fee Information [LAC 33:III.517.D.17]

Fee Parameter: If the fee code is based on an operational parameter (such as number of employees or capital cost), enter that parameter here. _____

Industrial Category: Enter the Standard Industrial Classification (SIC) Codes that apply to the facility.

Primary SICC: 2869

Secondary SICC(s): _____

Project Fee Calculation: Enter fee code, permit type, production capacity/throughput, and fee amount pursuant to LAC 33:III.Chapter 2. Add rows to this table as needed. Include with the application the amount in the Grand Total blank as the permit application fee.

FEE CODE	TYPE	EXISTING CAPACITY	INCREMENTAL CAPACITY INCREASE	SURCHARGES				TOTAL AMOUNT
				MULTIPLIER	NSPS	PSD	AIR TOXICS	
0620					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$1866.00
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$
GRAND TOTAL								\$1866.00

****Optional** Fee Explanation:** Use the space provided to give an explanation of the fee determination displayed above.

Electronic Fund Transfer (EFT): If paying the permit application fee using an Electronic Fund Transfer (EFT), please include the EFT Transaction Number, the Date that the EFT was made, and the total dollar amount submitted in the EFT. If not paying the permit application fee using EFT, leave blank.

EFT Transaction Number

Date of Submittal

Total Dollar Amount

\$ _____

6. Key Dates

Estimated date construction will commence:

NA

Estimated date operation will commence:

NA

10. Certification of Compliance With Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application. For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

For corporations only: By signing this form, I certify that, in accordance with the definition of Responsible Official found in LAC 33:III.502, (1) I am a president, secretary, treasurer, or vice-president in charge of a principal business function, or other person who performs similar policy or decision-making functions; or (2) I am a duly authorized representative of such person; am responsible for the overall operation of one or more manufacturing, production, or operating facilities addressed in this permit application; and either the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or the delegation of authority has been approved by LDEQ prior to this certification.*

CERTIFICATION: I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Application for Approval of Emissions of Air Pollutants from Part 70 Sources, including all attachments thereto and the compliance statement above, are true, accurate, and complete.

a. Responsible Official		
Name Walter L. Glenn		
Title Plant Manager		
Company E.I. DuPont de Nemours and Co., Inc.		
Suite, mail drop, or division		
Street or P.O. Box 586 Highway 44		
City LaPlace	State LA	Zip 70068
Business phone (985) 536-5129		
Email Address Walter.L.Glenn@usa.dupont.com		

Signature of responsible official (See 40 CFR 70.2):

Walter L. Glenn

Date:

7/14/2014

*Approval of a delegation of authority can be requested by completing a Duly Authorized Representative Designation Form (Form 7218) available on LDEQ's website at <http://www.deq.louisiana.gov/portal/tabid/2758/Default.aspx>

CERTIFICATION: I certify that the engineering calculations, drawings, and design are true and accurate to the best of my knowledge.

b. Professional Engineer		
Name Doris B. Grego		
Title Senior Environmental Consultant		
Company E.I. DuPont de Nemours and Co., Inc.		
Suite, mail drop, or division		
Street or P.O. Box 586 Highway 44		
City LaPlace	State LA	Zip 70068
Business phone (985) 536-5437		
Email Address Doris.B.Grego@usa.dupont.com		

Signature of Professional Engineer:

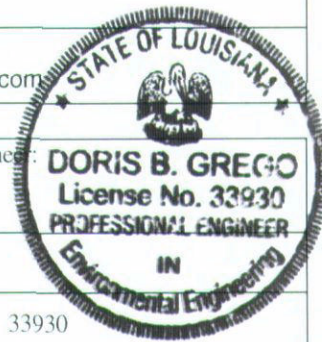
Doris B. Grego

Date:

7/8/14

Louisiana Registration No.

33930



11. Personnel [LAC 33:III.517.D.1]

a. Manager of Facility who is located at plant site		
Name Walter L. Glenn	<input type="checkbox"/> Primary contact	
Title Plant Manager		
Company E.I. DuPont de Nemours and Co., Inc.		
Suite, mail drop, or division		
Street or P.O. Box 586 Highway 44		
City LaPlace	State LA	Zip 70068
Business phone (985) 536-5129		
Email address Walter.L.Glenn@usa.dupont.com		

b. On-site contact regarding air pollution control		
Name Doris B. Grego	<input checked="" type="checkbox"/> Primary contact	
Title Senior Environmental Consultant		
Company E.I. DuPont de Nemours and Co., Inc.		
Suite, mail drop, or division		
Street or P.O. Box 586 Highway 44		
City LaPlace	State LA	Zip 70068
Business phone (985) 536-5437		
Email address Doris.B.Grego@usa.dupont.com		

c. Person to contact with written correspondence		
Name Doris B. Grego	<input checked="" type="checkbox"/> Primary contact	
Title Senior Environmental Consultant		
Company E.I. DuPont de Nemours and Co., Inc.		
Suite, mail drop, or division		
Street or P.O. Box 586 Highway 44		
City LaPlace	State LA	Zip 70068
Business phone (985) 536-5437		
Email address Doris.B.Grego@usa.dupont.com		

d. Person who prepared this report		
Name Doris B. Grego	<input checked="" type="checkbox"/> Primary contact	
Title Senior Environmental Consultant		
Company E.I. DuPont de Nemours and Co., Inc.		
Suite, mail drop, or division		
Street or P.O. Box 586 Highway 44		
City LaPlace	State LA	Zip 70068
Business phone (985) 536-5437		
Email address Doris.B.Grego@usa.dupont.com		

e. Person to contact about Annual Maintenance Fees		<input type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d <input type="checkbox"/> other (specify below)	
Name	<input type="checkbox"/> Primary contact	Suite, mail drop, or division	
Title		Street or P.O. Box	
Company		City	State Zip
Business Phone		Email Address	

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each currently effective air quality permit that has been issued to this facility or process unit (for process unit-specific permits).
- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or *State Operating Permit* was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or *State Operating Permit*, if one exists.

form_7195_r04
09/04/2013

18. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

Was Air Quality Dispersion Modeling as required by LAC 33:III performed in support of this permit application? (Air Quality Dispersion Modeling is only required when applying for PSD permits and as requested by LDEQ.)

☐ Yes ☒ No

Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for this facility in support of a air permit application previously submitted for this facility or process unit (for process unit-specific permits) or as required by other regulations AND approved by LDEQ?

☒ Yes ☐ No

If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:

December 1994

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Standard or (National Ambient Air Quality Standard {NAAQS})
Chloroprene	8 hours	250 $\mu\text{g}/\text{m}^3$	857 $\mu\text{g}/\text{m}^3$

19. General Condition XVII Activities- ☒ Yes ☐ No

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities.

- Expand this table as necessary to include all such activities.
- See instructions to determine what qualifies as a General Condition XVII Activity.
- Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application.

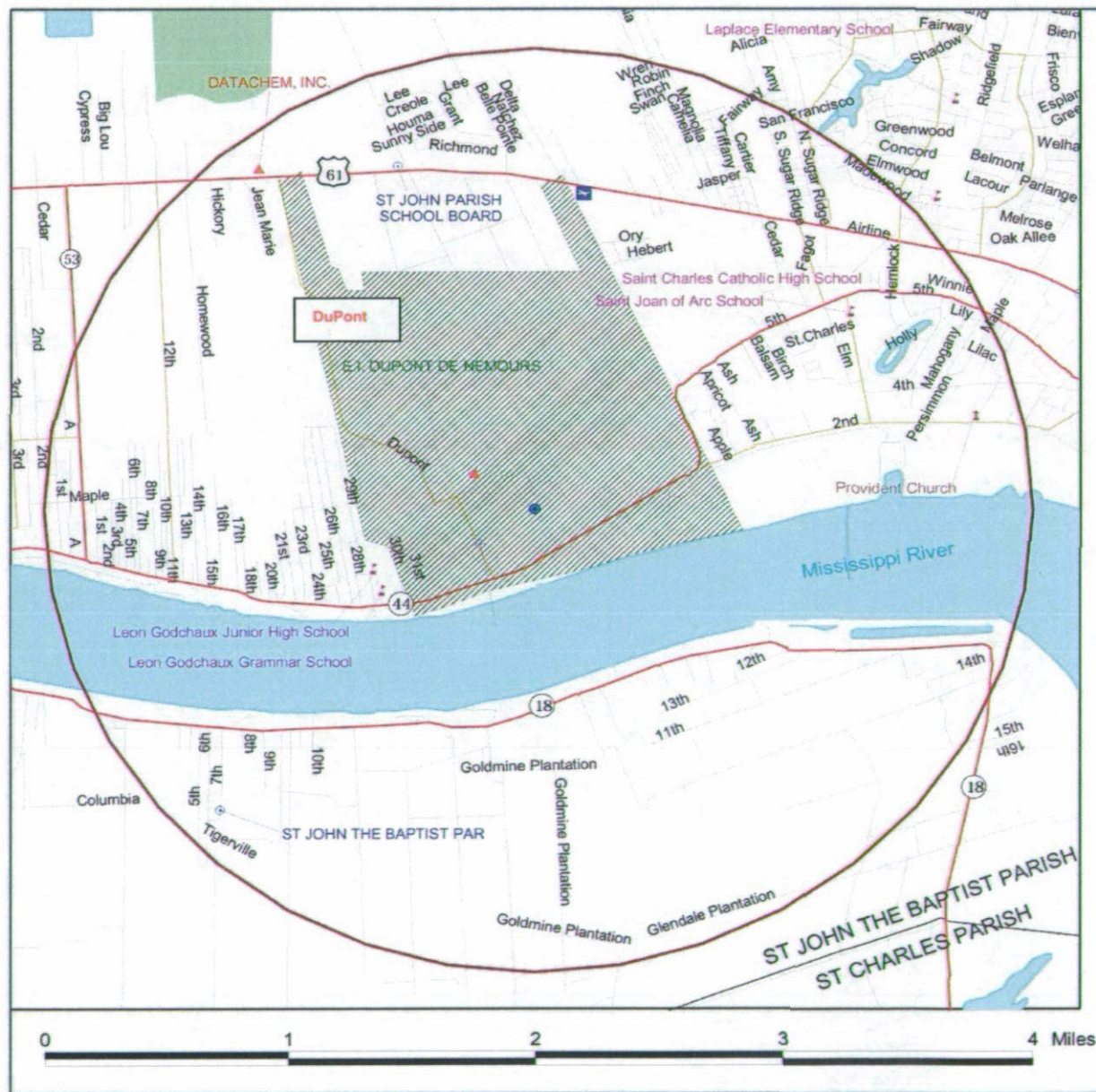
		Emission Rates – TPY					
Work Activity	Schedule	PM ₁₀	SO ₂	NO _x	CO	VOC	Other
Routine Maintenance Activities	150 hrs/yr	-	-	-	-	2	
Solid Deposit Removal from Tanks	80 days/yr					4.0	
Outage of Refrigeration Units	50 hrs/yr					0.12	
Aqueous Storage Vent Condenser (1140-20)	100 hrs/yr					0.15	
DCB Storage Tanks Condenser (1110-2A)	50 hrs/yr					0.02	
Catalyst Sludge Receiver (1110-4B)	50 hrs/yr					0.02	
DCB Storage Tank Vents (1117-1)	50 hrs/yr					0.17	
ACR Equipment Clearing	Every 3 weeks					0.10	
Decanter Cleaning	Semiannually					0.01	
Vessel Cleaning	Semiannually					0.145	
Maintenance on 1110-26 Scrubber	200 hrs/yr					0.11	
ACR Transfer Tank vent during scrubber maintenance	432 hrs/yr					0.2	

26. Sections of The Permit Application That Are Not Included

This section does not require any input on the part of the permit applicant. The purpose of this section is to communicate to LDEQ which sections of the permit application were intentionally omitted from the permit application. The sections indicated below were intentionally omitted from the permit application as allowed by the Paperwork Reduction Format of the *Louisiana Application for Approval of Emissions from Part 70 Sources*.

- | | |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | Portions of Section 2 – Process Description and Physical Location |
| <input checked="" type="checkbox"/> | Section 3 – Confidentiality |
| <input type="checkbox"/> | Section 7 - Pending Permit Applications – For Process Unit-Specific Permits Only |
| <input checked="" type="checkbox"/> | Section 8 - LAC 33:I.1701 Requirements – Answer all below for new sources and permit renewals |
| <input checked="" type="checkbox"/> | Section 9 – Permit Shield |
| <input checked="" type="checkbox"/> | Section 14a – Enforcement Actions |
| <input checked="" type="checkbox"/> | Section 14b – Schedule for Compliance |
| <input checked="" type="checkbox"/> | Section 15 – Letters of Approval for Alternate Methods of Compliance |
| <input checked="" type="checkbox"/> | Section 16 – Initial Notifications and Performance Tests |
| <input checked="" type="checkbox"/> | Section 17 - Existing Prevention of Significant Deterioration or Nonattainment New Source Review Limitations |
| <input type="checkbox"/> | Section 18 – Air Quality Dispersion Modeling |
| <input type="checkbox"/> | Section 19 – General Condition XVII Activities |
| <input checked="" type="checkbox"/> | Section 20 – Insignificant Activities |
| <input checked="" type="checkbox"/> | Section 21 - Regulatory Applicability for Commonly Applicable Regulations |
| <input checked="" type="checkbox"/> | Section 22 – Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping |
| <input checked="" type="checkbox"/> | Section 12 - Proposed Project Emissions and Section 23 – Emissions Inventory Questionnaire (EIQ) Forms |
| <input checked="" type="checkbox"/> | Section 24A – Project Summary |
| <input checked="" type="checkbox"/> | Section 24B – Creditable Contemporaneous Changes |
| <input checked="" type="checkbox"/> | Section 24C - BACT/LAER Summary |
| <input checked="" type="checkbox"/> | Section 24D – PSD Air Quality Analyses Summary |
| <input checked="" type="checkbox"/> | Section 24E – Nonattainment New Source Review Offsets |
| <input checked="" type="checkbox"/> | Section 24F – Economic Impact |
| <input checked="" type="checkbox"/> | Section 24G – Notification of Federal Land Manager |
| <input checked="" type="checkbox"/> | Section 25 - Environmental Assessment Statement (EAS or “IT” Question Responses) |

FIGURES



DuPont
Chloroprene Unit
Figure 1
Site Location Map



APPENDICES

APPENDIX A

EMISSION CALCULATIONS

DuPont
Condition XVII Emissions Calculations
Solids Removal from Tanks

The following calculations show the pounds VOCs vented during tank cleaning activities (solids removal).

a) Guidance – Max concentration 500 ppm of organics; max flow 1000 scfm

b) Average Molecular Weight of the gas

(DCB - Dichlorobutene; ACR – 2,3-dichloro-1,3-butadiene)

Chemical	% Composition	Molecular Weight	MW x %
Chloroprene	30%	88.54	26.56
Toluene	20%	92.13	18.43
DCB	20%	125	25
ACR	30%	123	36.9
	100%		106.9

c) The vented VOCs rate is calculated using the ppmv and flow

$$\begin{aligned}
 \text{Vented VOCs (scfm)} &= \frac{\text{Avg ppmv}}{10^6} \times \text{Vented Vapors (scfm)} \\
 \text{Vented VOCs (scfm)} &= \frac{500 \text{ ppmv}}{10^6} \times 1000 \text{ (scfm)} \\
 &= 0.5 \text{ scfm}
 \end{aligned}$$

d) The VOCs vented in pounds is calculated using the average molecular weight of the gas

$$\begin{aligned}
 &\frac{\text{Vented VOCs (scfm)} \times 106.9 \frac{\text{g}}{\text{mol}}}{379.6 \frac{(\text{g} \times \text{scf})}{(\text{lbs} \times \text{mol})}} \\
 &\frac{0.5 \text{ (scf)} \times 106.9 \frac{\text{g}}{\text{mol}}}{379.6 \frac{(\text{g} \times \text{scf})}{(\text{lbs} \times \text{mol})}} \\
 &0.14 \text{ lbs/min} = 8.4 \text{ lbs/hr}
 \end{aligned}$$

e) Total VOC pounds per year

$$\frac{\text{Vented VOCs (lbs/hr)} * \text{Operating hrs/yr}}{2,000 \text{ lbs/tons}}$$

Operating hours per year =

80 days of tank cleaning per year; 12 hours per day = 960 hours per year

$$\frac{8.4 \text{ lbs/hr} * 960 \text{ hrs/yr}}{2,000 \text{ lbs/tons}}$$

= 4.03 tons of VOC per year

f) Emissions by chemical

Chloroprene

$$4.03 \text{ tons/yr} * 0.30 * 2,000 \text{ lbs/tons} = 2,418 \text{ lbs/yr}$$

Chemical	% Composition	Emissions lbs/yr	MER lbs/yr
Chloroprene	30%	2,418	2,700
Toluene	20%	1,613	20,000
DCB	20%	1,613	Not Listed
ACR	30%	2,418	Not Listed
	100%	8,062	

APPENDIX B
FUGITIVE EMISSIONS PROGRAM
CONSOLIDATION NOTICE

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No. 7012 3460 0000 8286 5279

Agency Interest No. 38806
Activity No.: PER20130006

Mr. Walter L. Glenn
Plant Manager
E. I. DuPont de Nemours & Co., Inc.
586 Hwy 44
Laplace, LA 70068

RE: Letter of Response, E. I. DuPont de Nemours & Co., Inc. - Pontchartrain Works
E I DuPont de Nemours & Co Inc, Laplace St. John the Baptist Parish, Louisiana

Dear Mr. Glenn:

By letter dated November 18, 2013, E. I. DuPont de Nemours & Co., Inc. (DuPont) requested consolidation of all applicable site fugitive emission programs in accordance with the Louisiana Fugitive Emission Program Consolidation Guidelines including the Source Notice and Agreement. DuPont will implement the consolidated program beginning January 1, 2014. All units will comply with the HON (40 CFR 63 Subpart H) as the most stringent and guiding fugitive rule. Semiannual reports will be submitted by August 15 and February 15 to cover the periods January 1 through June 30 and July 1 through December 31, respectively.

Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one of the applicable fugitive emissions programs.

- a. Streamlined program shall be applicable to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size or component available in any of the programs being streamlined.
- b. Leak definitions and monitoring frequency shall be used based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall define as once every four quarters. Some allowance may be made in the first year on the streamlined program in order to allow for transition from existing monitoring schedules.

- c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on August 15 and February 15, to cover the periods from January 1 through June 30, and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

<u>Unit or Plant Site</u>	<u>Programs Streamlined</u>	<u>Stream Applicability</u>	<u>Overall Most Stringent Program</u>
DuPont Site			
AI-1101 Diamines	40 CFR 63 Subpart H-HON 40 CFR 63 Subpart FFFF	5% VOHAP 5% VOHAP	40 CFR 63 Subpart H-HON MACT
AI-38806 Chloroprene	40 CFR 63 Subpart U-P & R I LA Non-HON	5% VOHAP 5% VOTAP	
Neoprene	NSPS 40 CFR 60	10% VOC	
ACR	RCRA 40 CFR 264 Subpart BB	10% VOC	
HCL Recovery	LAC 33:III.2121	10% VOC	

Based on the information provided, the Office of Environmental Services, Air Permits Division, has no objection to consolidation of all site fugitive emission programs in accordance with the Louisiana Fugitive Emission Program Consolidation Guidelines. The facility shall include the Louisiana Consolidated Fugitive Emission Program Stringency requirements in the next permit modification. This letter shall be attached to each Part 70 Operating permit under AI-1101 and AI-38806.

Sincerely,



Sam L. Phillips
Assistant Secretary

December 20, 2013
Date

SLP:LND